


## CRIMINAL COMPLAINT

United States District Court	DISTRICT of ARIZONA
United States of America v. <b>Sara Jo Widgeon</b> ; DOB: 1986; United States <b>Staci Linette Bullock</b> ; DOB: 1977; United States	DOCKET NO.  MAGISTRATE'S CASE NO. <b>20-07208 MB</b>
Complaint for violation of Title 8 United States Code § 1324(a)(1)(A)(v)(I) and 1324(a)(1)(A)(ii)	
<b>COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:</b> On or about March 8, 2020, in the District of Arizona, <b>Sara Jo Widgeon</b> and <b>Staci Linette Bullock</b> , named herein as defendants and conspirators, did knowingly and intentionally combine, conspire, confederate, and agree with each other and other persons, known and unknown, to transport certain illegal aliens, namely <b>Floralma Roblero-Gonzalez</b> and <b>Otoniel Solis-Santizo</b> , in furtherance of such violation of law; in violation of <b>Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I) and 1324(a)(1)(A)(ii).</b>	
<b>BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:</b> On or about March 8, 2020, in the District of Arizona, a red 2017 Hyundai Santa Fe entered the primary inspection lane at the Ajo Immigration Checkpoint. The driver, <b>Sara Jo Widgeon</b> and passenger, <b>Staci Linette Bullock</b> , provided identification, but the two passengers in the backseat did not. <b>Widgeon</b> stated the female in the back was her aunt, but did not know her name. The occupants further stated they were from Phoenix, but could not remember their address. The vehicle was referred to secondary, where United States Border Patrol agents determined the two passengers in the back, namely <b>Floralma Roblero-Gonzalez</b> and <b>Otoniel Solis-Santizo</b> , were citizens of Mexico, in the United States illegally  In a post- <i>Miranda</i> statement, <b>Staci Linette Bullock</b> stated <b>Sara Jo Widgeon</b> asked to go with her to pick up two people from Lukeville, AZ. <b>Bullock</b> stated they arrived at a gas station, where two people entered the vehicle. <b>Bullock</b> stated the passengers spoke little English and she did not speak to them.  Material witnesses <b>Floralma Roblero-Gonzalez</b> and <b>Otoniel Solis-Santizo</b> , stated after crossing into the United States illegally, they were guided to a location to be picked up. <b>Roblero-Gonzalez</b> stated they walked to a gas station, and was told a red car would be waiting for them. <b>Roblero-Gonzalez</b> stated after entering the vehicle, the driver, <b>Widgeon</b> was trying to communicate with them in English, and as they approached the checkpoint, <b>Widgeon</b> told the passengers to say they were American citizens. <b>Otoniel Solis-Santizo</b> stated when the vehicle arrived, <b>Widgeon</b> signaled them by flashing the headlights several times. <b>Solis-Santizo</b> stated at one point, he heard the driver or passenger say this was going to be "easy." <b>Solis-Santizo</b> further stated <b>Widgeon</b> and <b>Bullock</b> were on their cellphones as they drove, and believed they were talking to the people that smuggled them from Mexico, and therefore knew they were in the country illegally.	
MATERIAL WITNESS IN RELATION TO THE CHARGE: <b>Floralma Roblero-Gonzalez</b> and <b>Otoniel Solis-Santizo</b>	
Detention Requested Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge. AUTHORIZED BY: AUSA JAA/lmw <i>JAA</i>	SIGNATURE OF COMPLAINANT  OFFICIAL TITLE Border Patrol Agent
Sworn to before me and subscribed in my presence.	
SIGNATURE OF MAGISTRATE JUDGE <sup>(1)</sup> <i>June 12, 2020</i>	DATE March 9, 2020

1) See Federal rules of Criminal Procedure Rules 3 and 54